

EXHIBIT 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE ALUMINUM WAREHOUSING
ANTITRUST LITIGATION

13 MD 2481 (KBF)

This Document Pertains To:

ALL ACTIONS

**DEFENDANTS' FOURTH REQUESTS
FOR PRODUCTION OF DOCUMENTS TO PLAINTIFFS**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Defendants Goldman Sachs & Co., Goldman Sachs International, Metro International Trade Services LLC, J. Aron & Company, Mitsi Holdings LLC, Henry Bath LLC, JPMorgan Securities plc, Glencore Ltd., and Pacorini Metals USA, LLC (collectively, "Defendants"), through their undersigned counsel, hereby request that Plaintiffs Ampal, Inc., Custom Aluminum Products, Inc., Claridge Products and Equipment, Inc., Extruded Aluminum Corporation, Agfa Corporation, Agfa Graphics, N.V., Mag Instrument, Inc., and Eastman Kodak Co. (collectively, "Plaintiffs") produce the documents and things described below for inspection and copying at the offices of Covington & Burling LLP, One CityCenter, 850 Tenth Street, NW, Washington, DC 20001.

DEFINITIONS

The definitions and rules of construction set forth in Federal Rule of Civil Procedure 34 and Local Civil Rule 26.3 are hereby incorporated and apply to these requests for production of documents. These definitions apply to these requests without regard to capitalization. Defendants reserve the right to serve additional requests for production of

documents. These requests shall be deemed made in all related, consolidated, or coordinated actions.

1. The terms “document,” “communication,” “concerning” and “person” have the meanings set forth in Local Civil Rule 26.3.

2. “Local Civil Rules” means the Local Civil Rules of the United States District Court for the Southern District of New York.

3. The term “Aluminum” shall mean the metallic chemical element, chemical symbol Al, atomic number 13, whether in the form of ingots, billets, sows, plates, sheets, foils, rods, bars, wires, or any other form, and whether pure or impure.

4. The terms “You” and “Your” refer to Ampal, Inc., Custom Aluminum Products, Inc., Claridge Products and Equipment, Inc., Extruded Aluminum Corporation, Agfa Corporation, Agfa Graphics, N.V., Mag Instrument, Inc., and Eastman Kodak Co. and each of their predecessors, successors, divisions, subsidiaries, and affiliates; each other person directly or indirectly, wholly or in part, owned or controlled by them; each partnership or joint venture to which any of them is a party; and all present and former directors, officers, employees, agents, consultants, or other persons acting on behalf of any of them.

5. To bring within the scope of these requests all documents that might otherwise be construed to be outside of their scope, the following rules of construction apply: (i) the masculine, feminine, or neuter pronoun shall not exclude other genders; (ii) the word “including” shall be read to mean “including without limitation”; (iii) the present tense shall be construed to include the past tense and vice versa; (iv) references to employees, officers, directors, or agents shall include both current and former employees, officers, directors, and agents; (v) the terms “and” and “or,” and “all,” “any,” and “each,” shall be construed in

accordance with Local Civil Rule 26.3; and (vi) in accordance with Local Civil Rule 26.3, the use of the singular form of any word includes the plural and vice versa.

INSTRUCTIONS

1. These document requests are continuing in nature, requiring supplemental production of documents if You later identify additional documents responsive to these requests pursuant to Federal Rule of Civil Procedure 34.

2. These document requests call for production of responsive documents in Your possession, custody, or control, including but not limited to any of Your respective employees, agents, attorneys, or other persons acting or purporting to act on Your behalf, regardless of location.

3. For the purpose of reading, interpreting, or construing the scope of these requests, the terms used shall be given their most expansive and inclusive interpretation.

4. Unless instructed otherwise, each request shall be construed independently and not by reference to any other request for the purpose of limitation or exclusion.

5. If any portion of a document is responsive to any request, the entire document shall be produced.

6. You must answer each request for production separately and fully, unless it is objected to, in which event the reasons for objection should be specifically and separately stated.

7. You must produce responsive documents as they have been kept in the usual course of business or organize or label them to correspond to the enumerated requests of this demand.

8. If in answering these requests You claim any ambiguity in interpreting either a request or a definition or instruction applicable thereto, You should not use that claim as

a basis for refusing to respond, but rather You shall set forth as part of Your response to such request the language deemed to be ambiguous and the interpretation chosen to be used in responding to the request.

9. If You withhold any document, or any portion of any document, under a claim of privilege, immunity, or protection, including the attorney-client privilege or work product doctrine, You shall provide a written privilege log that sets forth the information required by Federal Rule of Civil Procedure 26(b)(5) and Local Civil Rule 26.2.

10. If You redact information from a document produced in response to a request, You shall identify the redaction by stamping the word “Redacted” on the document at each place where information has been redacted and separately log each redaction on the privilege log.

REQUESTS FOR PRODUCTION

Request No. 1

For each purchase of Aluminum by You from January 1, 2006 to the present, please provide transaction-level data and/or other documents sufficient to show:

- a. The location from which the supplier shipped the Aluminum to You;
- b. The name and place of incorporation of the corporate entity who shipped the Aluminum to You;
- c. The name and place of incorporation of the corporate entity who received the Aluminum;
- d. The location from which the supplier issued the invoice for the purchase of Aluminum by You;
- e. The location at which You received the invoice for the purchase of Aluminum;
- f. The location from which You paid for the purchase of Aluminum;

- g. The name and place of incorporation of the corporate entity that issued the invoice for the purchase of Aluminum to You;
- h. The name and place of incorporation of the corporate entity who received the invoice for the purchase of Aluminum; and
- i. The name and place of incorporation of the corporate entity who paid for the purchase of Aluminum.

Request No. 2

For each sale of Aluminum or product(s) containing Aluminum by You from January 1, 2006 to the present, please provide transaction-level data and/or other documents sufficient to show:

- a. The name and place of incorporation of the corporate entity who shipped the Aluminum or product(s) containing Aluminum;
- b. The location from which You issued the invoice for the sale of Aluminum or product(s) containing Aluminum; and
- c. The name and place of incorporation of the corporate entity that issued the invoice for the sale of Aluminum or product(s) containing Aluminum.

Dated: June 11, 2015

Respectfully submitted,

s/ Robert D. Wick

Robert D. Wick (rwick@cov.com)
David W. Haller (dhaller@cov.com)
Henry B. Liu (hliu@cov.com)
Covington & Burling LLP
1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 662-5487
rwick@cov.com

*Attorneys for Defendant Henry Bath LLC and
JPMorgan Securities plc*

s/ Richard C. Pepperman

Richard C. Pepperman II
(peppermanr@sullcrom.com)
Suhana S. Han (hans@sullcrom.com)
Yavar Bathaee (bathaee@sullcrom.com)
125 Broad Street
New York, New York 10004-2498
Telephone: (212) 558-4000
Facsimile: (212) 558-3588

*Attorneys for Defendants Goldman Sachs & Co.,
Goldman Sachs International, Metro International
Trade Services LLC, J. Aron & Company, and Mitsi
Holdings LLC*

s/ Eliot Lauer

Eliot Lauer (elauer@curtis.com)
Jacques Semmelman (jsemmelman@curtis.com)
Chelsea McLean (chelsea.mclean@curtis.com)
CURTIS, MALLETT-PREVOST, COLT & MOSLEY
LLP
101 Park Avenue
New York, NY 10178
Telephone: (212) 696-6000
Facsimile: (212) 697-1559

Attorneys for Defendant Glencore Ltd.

s/ John M. Nannes

John M. Nannes (*john.nannes@skadden.com*)

John H. Lyons (*john.h.lyons@skadden.com*)

SKADDEN, ARPS, SLATE,

MEAGHER & FLOM LLP

1440 New York Avenue, N.W.

Washington, D.C. 20005

Telephone: (202) 371-7500

Facsimile: (202) 661-9191

Attorneys for Defendant Pacorini Metals USA, LLC